

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

LIEUTENANT SHARON ROBINSON,  
DIRECTOR WINONA HANNAH,  
SERGEANT MARCELLA SAWYER,  
TELECOMMUNICATIONS CARLA  
KIMBER, SERGEANT VERONICA  
HARRIS and OFFICER LAWANDA  
BURRAS,

Plaintiffs,

v.

CHICAGO STATE UNIVERSITY,  
CAPTAIN JAMES MADDOX, individually  
and in his official capacity, and LIETUENANT  
CHARLES STEWARD, individually and in  
his official capacity,

Defendants.

Case No. 19-cv-00395

Honorable Magistrate Judge Harjani

**JOINT MOTION FOR CLARIFICATION**

The parties, by and through their attorneys, THE WALTERS LAW FIRM and HUSCH BLACKWELL, respectfully request clarification of the February 1, 2022 order. In support of thereof, Plaintiffs state as follows:

1. On January 24, 2022, Judge Harjani entered an order scheduling a status hearing on February 4, 2022. (Dkt. #89).
2. Prior to that, on June 22, 2021, Judge Harjani entered an order rescheduling a status hearing and reminding the parties to file a proposed discovery schedule within five days of the status. (Dkt. #80).
3. Also, Judge Harjani's standing orders direct parties to file an Initial Status Report within three days of a status.

4. The parties misunderstood this and believed their Initial Status Report, including discovery schedule, was to be filed within three days, which would be February 1, 2022.
5. As such, the parties had been jointly putting together a status report, including an agreed discovery schedule, expected to be filed February 1, 2022, pursuant to the Standing Order. (See Exhibit 1, Initial Joint Status Report).
6. However, on February 1, 2022, before the parties could file their Joint Initial Status Report, Judge Harjani entered an order creating a discovery timeline since he did not believe the parties intended to propose one. (See Dkt. #93).
7. The parties have no objection to proceeding with the court's proposed discovery schedule, if so ordered. However, they had previously agreed on another, as laid out in the Initial Status Report, and wanted to inform the court they had not failed to propose one but misunderstood the due date and ask the court to consider entering the parties' proposed schedule. The parties apologize for the misunderstanding.

WHEREFORE, for the reasons stated herein, Plaintiffs respectfully request this Court clarify whether it would like the parties to proceed on their agreed discovery schedule or the one set by the court. Defendants have no objection and agree with the motion.

DATED: February 1, 2022

Respectfully Submitted,

<u>/s/ Kellie Walters</u> Attorney for Plaintiff The Walters Law Firm 350 N. Orleans St., Ste. 9000N Chicago, IL 60654 kwalters@walterslawoffice.net	<u>/s/ Lisa Parker</u> Lisa J. Parker (#6230008) HUSCH BLACKWELL LLP 120 South Riverside Plaza, Suite 2200 Chicago, IL 60606 (312) 655-1500 (312) 655-1501 (Facsimile)
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	<p><a href="mailto:lisa.parker@huschblackwell.com">lisa.parker@huschblackwell.com</a></p> <p>John W. Borkowski (#6320147) 1251 North Eddy Street, Suite 200 South Bend, IN 46617 (574) 239-7010 (574) 287-3116 (Facsimile) <a href="mailto:john.borkowski@huschblackwell.com">john.borkowski@huschblackwell.com</a></p> <p><i>Counsel for Defendants</i></p>
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CERTIFICATE OF SERVICE

The undersigned attorney swears and affirms that Plaintiff's Motion for an Extension has been tendered to all interested parties on February 1, 2022 via the Northern District of Illinois' ECF system:

s/ Kellie Walters